

No. 15-10429-F

**IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT**

CREW ONE PRODUCTIONS, INC.,

Petitioner,

v.

NATIONAL LABOR RELATIONS BOARD,

Respondent.

On Appeal from the National Labor Relations Board
Case Nos. 10-CA-138169 & 10-RC-124620

**ANSWER OF CREW ONE PRODUCTIONS, INC. TO NLRB'S CROSS-
APPLICATION FOR ENFORCEMENT**

Under Fed. R. App. P. 15, Petitioner/Cross-Application Respondent Crew One Productions, Inc. hereby answers Respondent/Cross-Applicant National Labor Relation Board's Cross-Application for Enforcement of an Order of the National Labor Relations Board (filed March 5, 2015).

1. Crew One admits that the National Labor Relations Board (NLRB) issued on January 30, 2015 an Order in NLRB Case No. 10-CA-138169, reported at 362 NLRB No. 8, which relates to Crew One. Crew One admits that on February 2, 2015, Crew One filed a petition with this Court for review the same NLRB order and related agency orders.

2. Crew One admits that this Court has jurisdiction over the NLRB's Cross-Application for Enforcement and that venue is proper in this Circuit.

3. Crew One denies that any unfair labor practice has occurred and denies that the NLRB is entitled to the relief sought in its Cross-Application. Crew One denies that it is an "employer" as defined by the National Labor Relations Act, 29 U.S.C. §§ 151, et seq., and denies that it is required to bargain with the International Association of Theatrical State Employees. Crew One also states that Local 927 of the International Association of Theatrical State Employees has a disqualifying conflict of interest.

4. Crew One denies all other allegations contained in the NLRB's Cross-Application for Enforcement and requests that the above-mentioned NLRB order, and all related agency orders, be modified, vacated, and set aside.

5. A Certificate of Service is attached.

This 17th day of March, 2015.

Respectfully submitted,

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**UNITED STATES COURT OF APPEALS
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Petitioner)	
)	
v.)	No. 15-10429-F
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NATIONAL LABOR RELATIONS)	
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CERTIFICATE OF SERVICE

This is to certify that on March 17th, 2015, a copy of the foregoing **Answer to Cross-Application for Enforcement of an Order of the National Labor Relations Board** was served upon all counsel of record by United States mail, with proper postage affixed thereto, and addressed as follows:

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This 17th day of March, 2015.

/s/ Robert F. Parsley